

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
IN RE: TERM COMMODITIES COTTON : Master Docket
: No. 12-cv-5126 (ALC) (KNF)
FUTURES LITIGATION :
: :
: :
This Document Relates To: All Actions :
: :
-----x

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS' MOTION FOR
LEAVE TO FILE UNDER SEAL**

1. The Stipulated Protective Order [Dkt. No. 106] entered by the Court on April 30, 2014 governs the management of information produced in this action that is designated “Confidential” or “Highly Confidential.”
2. The Stipulated Protective Order, and Section 7.C. of this Court’s Individual Practices, requires a party seeking to file “Confidential” or “Highly Confidential” information under seal to first obtain leave of Court. Requests for sealing are required to include proposed redactions to the sealed materials.
3. Pursuant to the Stipulated Protective Order, Defendants and certain non-parties have designated materials produced in discovery and deposition testimony as “Confidential” or “Highly Confidential.”
4. Plaintiffs have prepared a letter dated November 17, 2015. Plaintiffs are also submitting the Declaration of Amanda N. Miller in Further Support of Plaintiffs’ Request for an Extension of the Fact Discovery Deadline (“Miller Reply Decl.”). Plaintiffs’ letter and/or the Miller Reply Decl. references and/or quotes documents and/or deposition testimony that have been designated “Confidential” or “Highly Confidential.”

5. Plaintiffs are hand delivering their complete un-redacted November 17, 2015 letter submission and Miller Reply Decl. to Chambers and are emailing same to Defendants. Plaintiffs' proposed redactions to their November 17, 2015 letter submission are attached as Exhibit A hereto. Plaintiffs' proposed redactions to the Miller Reply Decl. are attached as Exhibit B hereto.

6. Accordingly, Plaintiffs respectfully request that the Court authorize Plaintiffs to file their November 17, 2015 letter submission and Miller Reply Decl. under seal.

Dated: New York, New York
November 17, 2015

Respectfully submitted,

**LOVELL STEWART HALEBIAN
JACOBSON LLP**
By: /s/ Christopher Lovell
Christopher Lovell
61 Broadway, Suite 501
New York, NY 10006
(212) 608-1900
(212) 719-4677 (fax)
Interim Lead Class Counsel